

FOR AGENDA

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Ref. Doc. 29255/2-2.8.2.1/4.17



DEPARTMENT OF THE AIR FORCE
AF FREQUENCY MANAGEMENT AGENCY
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95-183
 93-253

Post-It™ brand fax transmittal memo 7671		# of pages > 4
To <i>Bob James</i>	From <i>Steve Shultz</i>	
Co.	Co.	
Dept.	Phone #	
Fax # <i>418-2643</i>	Fax #	

9 APRIL 1996

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AUG 22 1996

MEMORANDUM FOR Chairman, IRAC

FROM: SCA

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

SUBJECT: IRAC Doc. 29255/2-2.8.2.1/4.17, ET Docket Number 95-183 and PP Docket
 Number 93-253, "Notice of Proposed Rulemaking and Order" dtd 15 Dec 95

1. Review of the subject document identified several areas of concern regarding impact on current and future Air Force spectrum access requirements. Specifically, Government access to spectrum in the 37-40 GHz bands supporting the Fixed and Mobile service as well as the Fixed-Satellite and Mobile-Satellite services must be assured. This access will benefit both government and non-government organizations.

2. Current and future requirements are developing within the 37-38.6 GHz band as we investigate more spectrum efficient and migratory options to support our information transfer needs. Many of these requirements will be satisfied using commercially available equipment using "dual use" technology. Thus, both government and non-government organizations benefit from the Federal Communications Commission (FCC) efforts at establishing rules and promoting commercial development. This band needs to be retained for government use. If competitive auctions are held, we feel government use will eventually be relegated to a "secondary status". Therefore, we request that the adjoining 36 - 37 GHz band be designated for exclusive government use to ensure sufficient spectrum resources are available to Federal entities.

3. In addition to our concerns regarding continued access to spectrum supporting the Fixed and Mobile services, there are plans for DOD satellite downlinks in the 39.5 - 40.5 GHz band. As you know, sufficient protection of downlink frequencies is necessary to ensure interference free operations. Adequate procedures must be in place to ensure this protection from adjacent user systems. We request that the 40.0 - 40.5 GHz band be set aside for exclusive government use and the 39.5 - 40 GHz non-government satellite allocation be deleted. Auctioning the 39.5 - 40 GHz band to the private sector should be reconsidered. In addition, use should be limited to low power, short range, backbone and backhaul terrestrial communications in order to benefit all parties.

4. If the above concerns are addressed and acceptable solutions adopted (see attachment), we can fully support the subject FCC proposal. If not, no auctioning of the 37-38.6 GHz band should be considered and the FCC should instead investigate using the 40.5-42.5 GHz band for that purpose. As an extra note, use of this portion of the spectrum by Canada should also be investigated prior to finalizing a competitive bidding plan.



NELSON V. POLLACK, GM-15, DAF
Air Force IRAC Representative

Attachment:
Proposed Allocation Changes

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Proposed Allocation Changes

AUG 22 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Band GHz	Government Allocation	Non-Government Allocation	Remarks
36-37	EARTH EXPLORATION-SATELLITE (Passive) FIXED MOBILE SPACE RESEARCH (Passive) US263 898	EARTH EXPLORATION-SATELLITE (Passive) FIXED MOBILE SPACE RESEARCH (Passive) US263 898	
37-38.6	FIXED MOBILE	FIXED MOBILE	Allow Auctions
38.6-39.5		FIXED FIXED-SATELLITE (Space-to-Earth) MOBILE US291	Auctions
39.5-40	FIXED-SATELLITE (Space-to-Earth) MOBILE-SATELLITE (Space-to-Earth) US291 G117	FIXED FIXED-SATELLITE (Space-to-Earth) MOBILE MOBILE-SATELLITE (Space-to-Earth) US291	No Auctions Low power Use
40-40.5	FIXED-SATELLITE (Space-to-Earth) MOBILE-SATELLITE (Space-to-Earth) G117	FIXED-SATELLITE (Space-to-Earth) MOBILE-SATELLITE (Space-to-Earth)	

898--In making assignments to stations of other services, administrations are urged to take all practicable steps to protect the spectral line observations of the radio astronomy service in the band 36.43-36.5 GHz from harmful interference. Emissions from space or airborne stations can be particularly serious sources of interference to the radio astronomy service (See Nos. 343 and 344 and Article 36)

US263--In the frequency bands36-37...GHz, the Space Research and Earth Exploration-Satellite service shall not receive protection from the FIXED and MOBILE service operating in accordance with the Table of Frequency Allocations.

US291--Television pickup stations in the mobile service may be authorized to use frequencies in the band 38.6-40 GHz on a secondary basis to stations operating in accordance with the Table of Frequency Allocations.

G117--In the bands39.5-40.5 GHz...the Government fixed-satellite and mobile-satellite services are limited to military systems.